



Order Filed on December 27, 2022
by Clerk

U.S. Bankruptcy Court
District of New Jersey

Case No.: 22-16408-RG

Chapter: 13

Hearing Date:
December 7, 2022 at 8:30 am

Hon. Judge: Rosemary Gambardella

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

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Attorneys for Secured Creditor Rushmore Loan
Management Services, LLC as Servicer for U.S. Bank
National Association, not in its individual capacity but
solely as trustee for RMTP Trust, Series 2021
Cottage-TT-V

In Re:

Abdul-Hakim Ali aka Abdul Ali
aka Hakim Ali

Debtor

CONSENT ORDER RESOLVING OBJECTION TO CONFIRMATION

The Consent Order set forth on the following pages two (2) through three (3) is hereby
ORDERED

DATED: December 27, 2022

A handwritten signature in cursive script, reading "Rosemary Gambardella".
Honorable Rosemary Gambardella
United States Bankruptcy Judge

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Debtor: Abdul-Hakim Ali aka Abdul Ali
aka Hakim Ali
Case No. 22-16408-RG
Caption: Agreed Order Resolving Objection to Confirmation

THIS MATTER having been brought before the Court by Herbert B. Raymond, Esq., attorney for the Debtor, Abdul-Hakim Ali aka Abdul Ali aka Hakim Ali ("Debtor"), upon the filing of a Chapter 13 Plan, and Rushmore Loan Management Services, LLC as Servicer for U.S. Bank National Association, not in its individual capacity but solely as trustee for RMTP Trust, Series 2021 Cottage-TT-V ("Secured Creditor"), by and through its attorneys, Friedman Vartolo LLP, having filed an Objection to the Confirmation of said Chapter 13 Plan, and the parties having subsequently resolved their differences; and the Court noting the consent of the parties to the form, substance and entry of the within Order; and for good cause shown;

IT IS HEREBY ORDERED as follows:

1. Secured Creditor has agreed to allow time for Debtors to apply for a loan modification. Debtors shall complete a loan modification by February 7, 2023 (or as extended by the Court), file a modified plan intending to cure the pre-petition arrears or surrender the property or dismiss or convert the bankruptcy case.
2. Trustee shall disburse pre-petition arrears to Secured Creditor while loss mitigation application is pending.
3. Debtor agrees to make timely regular post-petition monthly mortgage payments.
4. Debtor acknowledges that the monthly post-petition mortgage payment is subject to change in accordance with the terms of the note and mortgage.

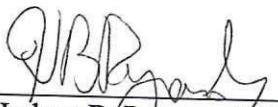
In the event of default or denial of loan modification:

If the Debtor fails to make the regular monthly payments within thirty (30) days of the date the payments are due, is denied a loan modification or fails to complete a modification by February 7, 2023 then the Secured Creditor may obtain an Order Vacating the Automatic Stay as to the Collateral by filing, with the Bankruptcy Court, Certification specifying the Debtor's failure to comply with this Order. At the time the Certification is filed with the Court, a copy of

the Certification shall be sent to the Chapter 13 Trustee, the Debtor, and the Debtor's Attorney.

5. This Order shall be incorporated in and become part of any Order Confirming Plan in the herein matter.

The undersigned hereby consent to the form,
And entry of the within Order:


Herbert B. Raymond, Esq.
Attorney for the Debtor

/s/ Jonathan Schwalb 12/22/22
Jonathan Schwalb, Esq.
Attorney for Secured Creditor